From: Granger, Michelle
To: Zizila, Frances

Subject: Re: DRAFT: Pohatcong OU3 - Scope and Schedule email

Date: Monday, August 06, 2018 5:23:12 PM
Attachments: DRAFT EPA PDI next steps.docx

Pohatcong OU3 - Fig. Additional delineation borings.pdf

Hi, Frances-

Please see attached draft email and figure. Please feel free to revise.

Thank you for your help!

Best,

Michelle-

From: Granger, Michelle

Sent: Thursday, August 2, 2018 9:02 AM

To: Zizila, Frances

Subject: RE: DRAFT: Pohatcong OU3 - Scope and Schedule email

ok. Thanks!

From: Zizila, Frances

Sent: Thursday, August 2, 2018 9:02 AM

To: Granger, Michelle

Subject: RE: DRAFT: Pohatcong OU3 - Scope and Schedule email

I am working episodically today, so email is best. If you need to chat, call my cell at 646.734.7416.

Thanks, Frances

-----Original Message-----From: Granger, Michelle

Sent: Thursday, August 02, 2018 8:59 AM To: Zizila, Frances <Zizila.Frances@epa.gov>

Subject: RE: DRAFT: Pohatcong OU3 - Scope and Schedule email

Hi, Frances-

Thank you for editing the schedule section below. Yes, hoping to send you #1 part today.

Best,

Michelle-

From: Zizila, Frances

Sent: Wednesday, August 1, 2018 4:48 PM

To: Granger, Michelle

Subject: RE: DRAFT: Pohatcong OU3 - Scope and Schedule email

I edited it. I would like to see # 1 when it is drafted.

-----Original Message-----From: Granger, Michelle

Sent: Wednesday, August 01, 2018 3:57 PM To: Zizila, Frances <Zizila.Frances@epa.gov>

Subject: DRAFT: Pohatcong OU3 - Scope and Schedule email

Hi, Frances-

Below is a draft email. #1 below is underway. I am working with the USACE on this section. The plan is the same as we discussed last week (we want 4 borings all together- 2 in an area that doesn't require shut down and two where the ovals were in the slides I sent you).

Anyway, in the meantime, could you take a look at item #2 (Schedule of the Project). You will recognize some of your language. I added some draft language at the end. Please feel free to revise and let me know if you have any questions.

Thank you! Michelle-

DRAFT EMAIL -

EPA has reviewed the PDI next steps slides and proposal discussed on our technical call on 7/2/18. EPA has two issues with the PDI proposal presented on the call:

- 1. Scope of the PDI- in progress.
- 2. Schedule of the Project The OU3 preliminary design report (30% design) is scheduled to be submitted in September 2018. Under paragraph 12 of the Consent Decree and Section VI.C.4, the 30% RD report is to contain the results of the PDI sampling. EPA had expected that all of the results of the PDI would be included in the 30% RD report.

During our technical call with PPPI/Rio Tinto on Monday, July 2nd, EPA was informed that additional sampling needed for the PDI in a processing area adjacent to the molding room is not scheduled for another 5 months until the end of December 2018 when the Albea facility will be shut down for a period of time. Absent additional information from PPPI/Rio Tinto documenting their efforts to secure an earlier date for this sampling from Albea as well as the reasons that an earlier date is not possible, EPA does not consider the December sampling date to be reasonable. In particular, two of the borings mentioned in item #1, the ones north and south of PDI-25 and PDI-26 can be done now, while the plant is in operation; therefore, EPA does not see a reason for delaying those two borings. In addition, in an effort to complete the other two borings sooner, PPPI/Rio Tinto should consider using two rigs to obtain the soil borings in a shorter period of time which would reduce the impact to

Albea's operations. Obtaining the results of the four soil borings sooner than December 2018 will enable those results to be presented in the 90% Design Report to be submitted to EPA in January 2019 and will build in extra time in case those results require stepping out for additional sampling. It is very important to EPA that the final RD report is completed by February 28, 2019.